

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

KHALED ELSISI, et al.,

Civil Action No. 2:23:cv-20773

Plaintiffs,
v.

Motion Return Date: June 16, 2025

CFT SOLUTIONS, et al.,

Defendants.

**NOTICE OF DEFENDANTS' MOTION FOR CLARIFICATION
AND TO COMPEL ATTENDANCE AT DEPOSITION**

PLEASE TAKE NOTICE that upon the accompanying Motion for Clarification and to Compel Attendance at Deposition, Brief in Support of Motion for Clarification and to Compel Attendance at Deposition, and Declaration of Justin B. Kaplan, Defendants, CFT Solutions, LLC, Renan De Rocha Gomes Bastos, and Arthur Percy (collectively, "Defendants"), through undersigned counsel, will move this Court before the Honorable Michael E. Farbiarz, on June 16, 2025, or a different date which the Court deems appropriate, at the Martin Luther King Building & U.S. Courthouse, 50 Walnut Street Room 4015, Newark, NJ 07101, for an order clarifying that Defendants may depose each Plaintiff, compelling each Plaintiff to coordinate their availability for and to attend a jurisdictional depositions, and granting such other and further relief as deemed just and proper.

Date: May 14, 2025

Respectfully submitted,

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CFT SOLUTIONS, et al.,

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**MOTION RETURN DATE:
JUNE 16, 2025**

**DEFENDANTS' MOTION FOR CLARIFICATION
AND TO COMPEL ATTENDANCE AT DEPOSITION**

Defendants, CFT Solutions, LLC, Renan De Rocha Gomes Bastos, and Arthur Percy (collectively, “Defendants”), through undersigned counsel and pursuant to D.N.J. L. Civ. R. 7.1 and 37.1, as well as this Court’s inherent authority, move for clarification of the Second Amended Jurisdictional Scheduling Order [D.E. 99] and to compel Plaintiffs to coordinate availability for and to attend depositions (the “Motion”). In support of the Motion, Defendants refer to and rely upon the Brief filed contemporaneously herewith in support of their Motion, and expressly incorporate it by reference.

WHEREFORE, Defendants, CFT Solutions, LLC, Renan de Rocha Gomes Bastos, and Arthur Percy, respectfully request that this Court grant the Motion and issue an Order enter an order clarifying that Defendants may depose each Plaintiff, compelling each Plaintiff to coordinate their availability for and to attend a jurisdictional deposition, and granting such other and further relief as deemed just and proper.

Date: May 14, 2025

Respectfully submitted,

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Clarification and to Compel Attendance at Deposition has been served by electronic mail upon Plaintiffs and all counsel of record.

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Dated: May 14, 2025

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